



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 22 2016

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7648 7870**  
**RETURN RECEIPT REQUESTED**

Mr. Ralph Wiley  
Environment, Health and Safety Manager  
Formed Fiber Technologies dba ConForm Automotive  
1630 Ferguson Court  
Sidney, Ohio 45365

Re: Notice of Violation  
Compliance Evaluation Inspection  
OHD987018207

Dear Mr. Wiley:

On February 24, 2016, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency inspected Formed Fiber Products dba ConForm Automotive in Sidney, Ohio (hereinafter "CFA," "facility" or "you"). As a generator of hazardous waste, used oil and universal waste, CFA is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* ("RCRA"). The purpose of the inspection was to evaluate CFA's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste, used oil and universal waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by CFA, EPA's review of records pertaining to CFA, and the inspector's observations, EPA has determined that CFA violated RCRA requirements related to the storage and management of universal waste, as described in paragraphs 1 and 2, below:

1. Universal Waste Labeling Requirements

Under Ohio Admin. Code § 3745-273-14(E) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste lamps must label or clearly mark each lamp or a container or package in which lamps are stored with any one of the following phrases: "Universal Waste – Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s)."

CFA is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste on its site at any time. At the time of the inspection, CFA accumulated universal waste lamps near a waste storage cage on the north side of its



Building #1. There were at least five boxes of universal waste lamps observed in the area during the inspection, only two of which were labeled as universal waste lamps. The three other boxes in the area were not visibly marked with one of the phrases above. CFA, therefore, violated the universal waste labeling requirement.

On the same day of the inspection, February 24, 2016, CFA provided a follow-up email which contained photographs of the universal waste storage area. The photographs displayed all boxes of universal waste lamps as being properly labeled. Thus, no further action is necessary to comply with this requirement.

## 2. Universal Waste Storage Requirements

Under Ohio Admin. Code § 3745-273-13(D)(1) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain universal waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

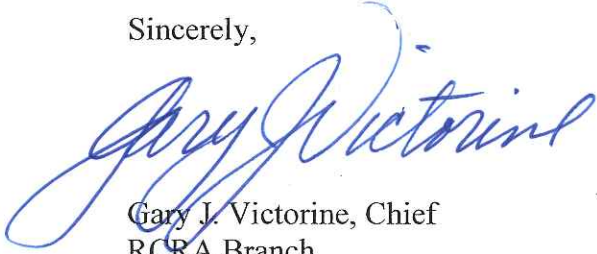
At the time of the inspection, CFA accumulated universal waste lamps near a waste storage cage on the north side of its Building #1. There were at least five boxes of universal waste lamps observed in the area during the inspection, one of which was open with waste lamps protruding from its top. CFA, therefore, failed to keep its containers of universal waste lamps closed and violated the storage requirement above.

On the same day of the inspection, February 24, 2016, CFA provided a follow-up email which contained photographs of the universal waste storage area. The photographs displayed all boxes of universal waste lamps secured and closed as required. Thus, no further action is necessary to comply with this requirement.

After the inspection, as documented in a February 24, 2016 email to EPA, you took certain actions to establish compliance with the above universal waste requirements. Based on the information received from CFA, EPA is not planning any additional enforcement action based on the inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates CFA's cooperation in this matter.

If you have any questions regarding this letter, please contact Mr. Brian Kennedy, of my staff, at (312) 353-4383 or at [kennedy.brian@epa.gov](mailto:kennedy.brian@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Cathy Altman, Ohio EPA ([cathy.altman@epa.ohio.gov](mailto:cathy.altman@epa.ohio.gov))  
Mitchell Matthews, Ohio EPA ([mitchell.matthews@epa.ohio.gov](mailto:mitchell.matthews@epa.ohio.gov))



U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 5, Land and Chemicals Division  
RCRA Branch, LR-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSPECTION DATE:** February 24, 2016

**SITE NAME:** Formed Fiber Technologies dba ConForm Automotive

**ADDRESS:** 1630 Ferguson Court  
Sidney, Ohio 45365

**EPA ID NUMBER:** OHD987018207

**GENERATOR STATUS:** Small Quantity Generator (2000)

**NAICS CODE:** 33639 Other Motor Vehicle Parts Manufacturing

**FACILITY CONTACT:** Ralph Wiley  
Environment, Health and Safety (EHS) Manager

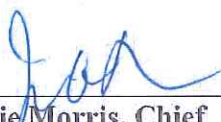
**EPA INSPECTOR:** Brian Kennedy  
Environmental Engineer  
Compliance Section 2  
RCRA Branch  
Land and Chemicals Division

**PREPARED BY:**

  
Brian Kennedy

3/17/2016  
Date

**APPROVED BY:**

  
Julie Morris, Chief  
Compliance Section 2

3/22/16  
Date





### **Purpose of Inspection**

An unannounced Compliance Evaluation Inspection (CEI) of Formed Fiber Technologies dba ConForm Automotive (hereinafter "CFA" or "facility") located at 1630 Ferguson Court, Sidney, Ohio took place on February 24, 2016. The CEI was conducted by U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (OEPA) personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations in the Ohio Administrative Code and the Code of Federal Regulations. Specifically, the CEI was an evaluation of CFA's compliance with the regulations governing generators of hazardous waste.

### **Participants**

The following persons were present for part or all of the inspection:

Ralph Wiley – EHS Manager	CFA
Cathy Altman – Environmental Specialist	OEPA
Brian Kennedy – Environmental Engineer	U.S. EPA

### **Introduction**

I arrived on site at 9:00 AM EST and met with Cathy Altman of the OEPA. We entered the front office and requested to see an environmental coordinator. Shortly thereafter Mr. Ralph Wiley, CFA's EHS Manager, arrived and led us to a nearby meeting room for an opening conference. I presented Mr. Wiley my enforcement officer credentials and business card and provided the Small Business Resource and Pollution Prevention information sheets. Mr. Wiley patched in Mr. Dave Walker, CFA's Corporate EHS Manager, to the opening conference on his cell phone. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a site tour that would involve photographs of hazardous waste storage areas, as well as a review of applicable CFA records pertaining to hazardous waste. I informed Mr. Wiley of CFA's right to claim any information or documents collected during the inspection as confidential business information.

### **Site Description**

The following information about CFA is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text, unless otherwise specified.

CFA manufactures a variety of rear compartment, trunk and side trim sheet carpet components and spare tire covers for application in the automotive industry. CFA receives pre-made plastic sheet carpet rolls from other ConForm Automotive plants and applies heat, specialty molds, and trimming capabilities to provide a finished product to its automotive assembly customers. Major CFA customers include Toyota and General Motors. Much of CFA's sheet carpet is produced from recycled material. From its website ([www.conformgroup.com](http://www.conformgroup.com)): "ConForm Automotive is North America's largest and most innovative manufacturer of needlepunched nonwoven fabrics and polyester staple fibers. We manufacture much of our own polyester fiber, using post-consumer and post-industrial recycled resin in a process we call 'Green Manufacturing.'"

Producing floor carpet using PET fiber that was produced from recycled resin sources is a significant benefit. This effort will result in 6-7 pounds of fiber per car being sourced from recycled resin, and 2 million pounds of recycled resin being used annually for one vehicle program alone."

CFA's location in Sidney, Ohio was originally constructed in the late 1980's as a different company. The location has undergone several ownership changes since then, and is currently owned by Formed Fiber Technologies. In 2013, Formed Fiber Technologies was purchased by Detroit Technologies, Inc., which is now in the process of rebranding the new partnership as ConForm Automotive.

CFA has approximately 150 employees on site. The facility typically operates three shifts Monday through Friday, though there are occasional Saturday operations. CFA's operations are split between two production buildings, #1 and #2. Building #1 houses most of CFA's thermoforming and assembly operations, while Building #2 is predominantly warehouse storage space with some thermoforming and laminating areas. Both buildings are equipped with wet fire suppression systems, and individual thermoforming machines have carbon dioxide suppression systems. CFA's fire extinguishers and other safety equipment are managed by Silco Fire and Security. The Sidney Fire Department has been on site and conducts periodic walkthroughs.

Much of the waste generated on site is scrap carpet that is unused after trimming and cutting of molded products. CFA consolidates this waste using a baler and ships the material for disposal in a non-hazardous landfill. CFA is currently looking for methods to recycle or sell this material for beneficial use. Used oil is generated from CFA's several thermoformers, which use hydraulic presses to shape heated pieces of carpet over pre-made dies. Universal wastes, including waste bulbs, batteries, and electronic wastes, are also generated from general operations. Both used oil and universal wastes are taken off-site by Heritage Crystal Clean. CFA stores these material in a dedicated waste storage area on the north side of Building #1.

In 2000 the facility notified as a Small Quantity Generator of hazardous waste. Waste codes associated with that notification included D001, D002, D003, D009, F003, and F005. CFA does not currently generate a regular hazardous waste stream other than waste liquids that are extracted from empty aerosol cans. This is done in a single 55-gallon drum equipped with an aerosol can puncturer and emission control device. When full, this drum is taken off-site by Heritage Crystal Clean for disposal. This drum is also kept in Building #1's waste storage area.

#### Site Tour

Mr. Wiley led Ms. Altman and myself through a tour of CFA. The tour began at a center assembly area in Building #1 where workers were applying finishing touches to trunk components and inspecting them for defects. Mr. Wiley explained that foam and other forming additions are added to thermoformed carpet pieces to create the desired shape when assembled within the vehicle. Near this assembly area was one of several robotic high-pressure water jets that CFA uses to cut out components from sheet carpet. Water from this system is eventually discharged to the local POTW. Scrap carpet generated during cutting operations, including waste carpet trim and cutting debris, is collected and placed with other scrap carpet for baling and disposal.



The tour continued east to the waste trim and carpet baler. Mr. Wiley stated that approximately 18 to 24 bales of waste carpet are generated on a daily basis. He said CFA has been searching for reuse opportunities for the material for some time but have not yet found an economical option. We proceeded to the east side of Building #1 and viewed several thermoforming systems, including ovens, their associated carbon dioxide suppression systems, and hydraulic press molds. No waste was observed in these areas.

CFA maintains its primary waste storage area on the north side of Building #1, which consists of a steel storage cage and other designated spaces around that cage. Outside the south end of the cage were four blue steel totes and five transparent plastic totes. Two of the four blue steel totes were accumulating used oil generated around CFA's site from molding operations. These two totes were labeled as "Used Oil" (See Photos 1 and 2 in Attachment A: Inspection Photographs). The two other blue steel totes were storing product lubricating oils (See Photo 3). The five transparent plastic totes were storing oily wastewater generated by CFA's operations. Mr. Wiley said the oily wastewater and used oil are managed as different waste streams by Heritage Crystal Clean when taken off-site. The material in the transparent plastic totes was mostly water with a visible layer of oil floating on top (See Photo 4).

Inside the waste storage cage CFA was storing several drums and numerous buckets of product chemicals and lubricating oils. Two 55-gallon drums against the north wall appeared to be storing used oil. Only one of the drums was labeled as "Used Oil" (See Photo 5). To the left of the drum labeled as used oil was a drum accumulating waste aerosol can liquids (See Photo 6). The drum, dated 8-10-15, was equipped with a puncturer and an emission control device. The granular media inside the emission control device did not match the "Ready" or "Replace" color on the device's legend (See Photo 7). Mr. Wiley was unsure why this was the case. The drum was marked with a Heritage Crystal Clean "Non-RCRA or RCRA Exempt" label which contained CFA's generator information, a D001 waste code, and a "CESQG" designation. Ms. Altman clarified to Mr. Wiley that even if CFA is a CESQG (Conditionally Exempt Small Quantity Generator), Ohio law requires that the facility ensure its hazardous waste is sent to a permitted treatment facility, and that a label stating "RCRA Exempt" is not accurate. The storage cage also contained three buckets of universal waste batteries (See Photo 8). These buckets were labeled and dated 8-10-15.

Outside the entrance to the waste storage cage was small area accumulating universal waste light bulbs. There were approximately five boxes accumulating bulbs, two of which had visible labels. The other boxes present were not labeled, and one of the boxes was open with bulbs protruding from its top (See Photo 9). Ms. Altman and I briefly explained the universal waste management standards to Mr. Wiley.

The tour continued to the maintenance area in the northwest corner of Building #1. There was a parts washer in the area which used an aqueous cleaning solution. An old sand blaster was also present, although Mr. Wiley had never seen it used, and a nearby flammables cabinet was storing only product chemicals. No used oil, universal waste, or other waste streams were observed the maintenance area.

Mr. Wiley led the tour to Building #2 and briefly explained its operations. The majority of the building was dedicated storage and warehouse space, though smaller production areas were present. We viewed several automated thermoformers heat and press carpet into shape and CFA workers trim and finish the product. Mr. Wiley also explained the lamination process in the building, which applies carpet to a sheet of harder plastic to produce a more rigid product. No waste was observed in Building #2, and Mr. Wiley stated that any wastes that are generated here are quickly moved to the storage area in Building #1. The tour concluded and Mr. Wiley led Ms. Altman and myself back to the conference room to review records.

#### **Record Review**

A diagram of CFA's facility is in Attachment B.

I requested to see shipment documents related to CFA's used oil, universal waste, and hazardous aerosol can waste. Mr. Wiley provided several bills of lading displaying the shipment of universal waste light bulbs, used oil, oily wastewater, electronic wastes, detergents and dirtied absorbents. The most recent shipment had occurred on February 17, 2016. All shipments were taken to Heritage Crystal Clean in Vandalia, Ohio. Mr. Wiley was unable to locate the last shipment document for hazardous aerosol can waste, but stated he would attempt to locate it.

#### **Closing Conference**

Mr. Wiley patched in Mr. Walker through a conference line for the closing meeting. I summarized my review of the site and any potential issues. The issues and items that were discussed included:

- CFA's generator status, and the potential to re-notify to the State of Ohio as a CESQG
- The proper labeling of containers of used oil
- The proper labeling and management of universal waste light bulbs

Mr. Wiley did not make any confidential business information claims during the inspection.

The inspection ended at 12:00 PM.

#### **Inspection Follow-Up**

On the same day of the inspection, Mr. Wiley provided an email containing photographs of the universal waste light bulb storage area and other containers in the waste storage area in Building #1. The containers of universal waste bulbs had been labeled and closed. Mr. Wiley also stated the drum of used oil that was not labeled in the storage caged did not actually contain oil but rather compacted pig mats. These follow-up photographs are in Attachment C.

#### **Attachments**

- A. Inspection Photographs
- B. Facility Diagram
- C. Follow-up Photographs
- D. Inspection Checklists

## ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

### RCRA Photo Log

Photo	Description	Time (CST)
1	A tote of used oil in Building #1's waste storage area.	9:36 AM
2	A tote of used oil in the waste storage area. The used oil label is not visible in this photograph.	9:36 AM
3	Two totes of product oil near the waste storage area.	9:36 AM
4	One of several totes of oily wastewater in the Building #1 waste storage area. The oil layer is visible on top of the water.	9:38 AM
5	A 55-gallon drum of used oil in the waste storage cage. The drum to the right was later found to contain pig mats, and not used oil.	9:45 AM
6	The 55-gallon drum accumulating hazardous waste aerosol can liquids in the waste storage cage.	9:45 AM
7	The emissions control device on the 55-gallon drum in Photograph 6.	9:45 AM
8	Two buckets accumulating universal waste batteries in the waste storage cage.	9:46 AM
9	Several boxes accumulating universal waste light bulbs near the waste storage cage.	9:52 AM

Formed Fiber Technologies dba ConForm Automotive  
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Photo 1:



Formed Fiber Technologies dba ConForm Automotive  
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Photo 2:





Formed Fiber Technologies dba ConForm Automotive  
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February 24, 2016

**Photo 3:**



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**Photo 4:**





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**Photo 5:**



Photo 6:





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**Photo 7:**





**Photo 8:**





Formed Fiber Technologies dba ConForm Automotive  
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**Photo 9:**



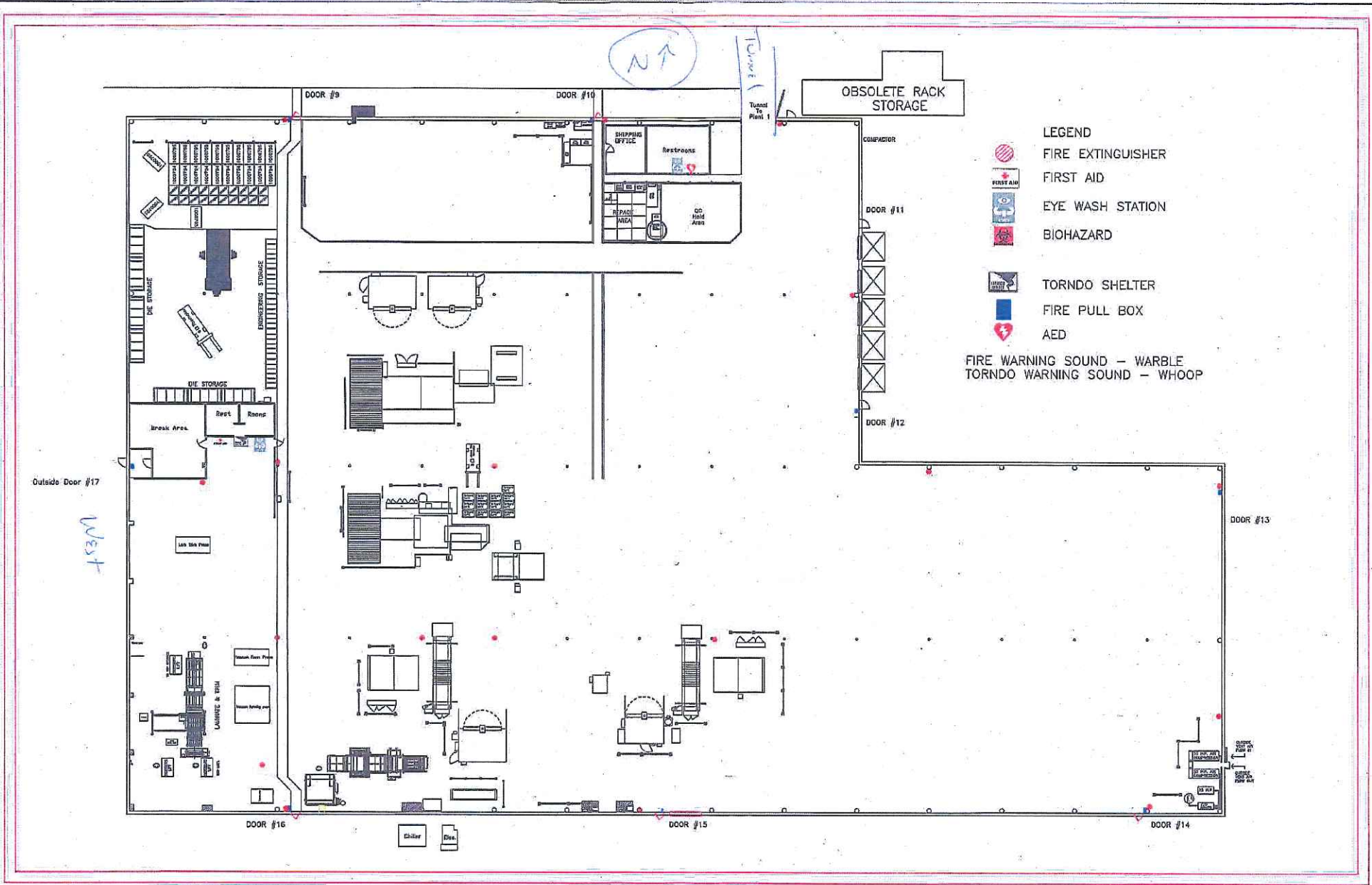
## ATTACHMENT B: Facility Diagram











## ATTACHMENT C: Follow-Up Photographs





Formed Fiber Technologies dba ConForm Automotive  
OHD987018207  
February 24, 2016



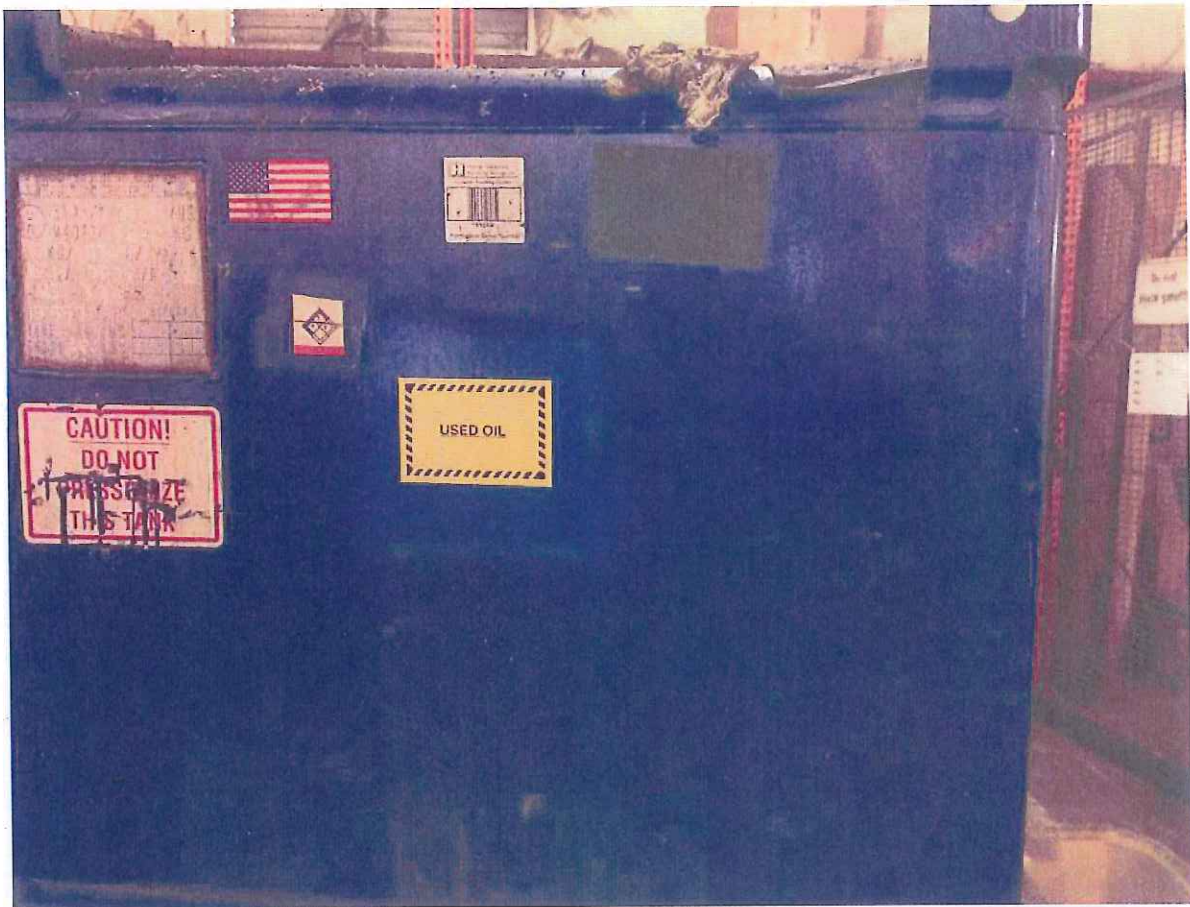








Formed Fiber Technologies dba ConForm Automotive  
OHD987018207  
February 24, 2016





## ATTACHMENT D: Inspection Checklists





ConForm Automotive OHD987018207 2/24/2016

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG:  $\leq 100$  Kg. (Approximately 25-30 gallons) of waste in a calendar month or  $\leq 1$  Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $> 1$  Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce $\leq 100$ kg. of hazardous waste per month in accordance with 3745-51-05(A)? [conditionally exempt small quantity generator ("CESQG")] <i>Only HW observed aerosol can liquids</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is subject to the Small Quantity Generator ("SQG") regulations. If so, complete the Small Quantity Generator Requirements checklist. If quantities of acute hazardous waste accumulated on-site at any one time exceed 1 Kg. - or the generator produces 1,000 Kg or more of hazardous waste per month, it is subject to the Large Quantity Generator ("LQG") regulations. If so, complete the Large Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**TREATMENT OF HAZARDOUS WASTE**

4.	Does the generator treat hazardous waste in a:	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>





Con Form Automotive OH0987018207 2/24/2016

USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS		
<p>NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.</p> <p>2. Inspectors can check BUSTR's web-site at <a href="https://www.comapps.ohio.gov/sfm/fire_apps/bustr/bustr/PublicInquiry.asp">https://www.comapps.ohio.gov/sfm/fire_apps/bustr/bustr/PublicInquiry.asp</a> to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: <a href="https://www.comapps.ohio.gov/sfm/fire_apps/bustr/bustr/SearchByCounty.asp">https://www.comapps.ohio.gov/sfm/fire_apps/bustr/bustr/SearchByCounty.asp</a>.</p>		
<b>PROHIBITIONS</b>		
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: For example, used oil contaminated scrap metal stored in a pile.		
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).		
<b>GENERATOR STANDARDS</b>		
4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, <u>unless</u> the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.		
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.		
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Facility Name/Inspection Date]

[ID Number]

Generators, Collection Centers and Aggregation Checklist April 2014 revision

Page 1 of 2

9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

#### ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).*

#### GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).*

#### COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.*

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ConForm Automotive 04D987018207 2/24/2016

### SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

#### PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

#### WASTE MANAGEMENT AND LABELING/MARKING

##### UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

##### UNIVERSAL WASTE PESTICIDES

8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT</b>				
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]			
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]			
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

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	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
18.		Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
19.		Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>					
20.		Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] <i>Open container of fluorescent lamps seen</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
21.		Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
<p><b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b></p>					
22.		Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] <i>2 out of ~5 boxes of lamps were visibly labeled</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
<b>ACCUMULATION TIME</b>					
23.		Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
<p><b>NOTE: Accumulation is defined as date generated or date received from another handler.</b></p>					
24.		Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		If yes, describe below: <i>Shipment documentation, container labeling, etc.</i>			

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<b>EMPLOYEE TRAINING</b>			
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES</b>			
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b>			
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>			
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>EXPORTS</b>			
<i>NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]</i>			
<i>NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.</i>			

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